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SEP 02 2010

APCO

August 31, 2010

Gary Walsh
Lincoln Lancaster County Health Department
3140 N Street
Lincoln, Nebraska 68510

Subject: Initial RICE Notification

Dear Mr. Walsh:

Enclosed is the initial notification form as required in 40 CFR Part 63, Subpart ZZZZ for three (3) emergency compression ignition reciprocating internal combustion engines located at Nebraska Public Power District's Sheldon Station. It is NPPD's interpretation that these engines meet the definition of emergency engines as stated in 40 CFR 63.6675 and therefore are not required to submit the initial notification form. However, based on conversations with Gary Bergstrom with LLCHD on August 30, 2010 it is the LLCHD's interpretation that these engines cannot be classified as emergency unless an applicable permit specifically limits the engine's use to emergency uses only. As a result of this interpretation and recommendations from the LLCHD, NPPD, out of an abundance of caution, is submitting the initial notification for these engines. If you have any questions please contact me at 402-563-5355.

Sincerely,

Joe L. Citta, Jr.
Corporate Environmental Manager

Enclosure

Cc: Gary Bergstrom – LLCHD
EPA Region VII – Chief, APCO

General Office

1414 15th Street / PO Box 499 / Columbus, NE 68602-0499

Telephone: (402) 564-8561 / **Fax:** (402) 563-5527

www.nppd.com



Lincoln-Lancaster County Health Department

Air Quality Program
3140 N Street
Lincoln, NE 68510

Date Received

LLCHD use only

INITIAL NOTIFICATION FORM

Applicable Rule: 40 CFR Part 63 – Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

A copy of the applicable rule, mentioned above, can be found at the following link:

<http://www.epa.gov/ttn/atw/rice/fr15jn04.pdf>

The revised requirements for Compression Ignition engines, effective March 3, 2010, can be found at the following link:

<http://www.epa.gov/ttn/atw/rice/fr03mr10.pdf>

Corrected requirements for new and reconstructed stationary emergency and limited use RICE with a site rating >500 hp located at a major source of HAP emissions can be found at the following link:

<http://edocket.access.gpo.gov/2010/pdf/2010-15886.pdf>

SECTION 1 – General Information

Print or type the following information for each facility for which you are making an initial notification and/or notification of compliance status. If you would like to obtain an electronic copy of this document in MS Word format, download a copy at the following address:

www.lincoln.ne.gov/city/health/enviro/pollu/airforms.htm

1. Facility Identification Number (optional): _____ NAICS Code: 221112
2. Responsible Official's Name & Title: Patrick L. Pope, Vice President and Chief Operating Officer
3. Responsible Official's Phone Number: (402) 563-5029
4. Responsible Official's Address: 1414 15th Street Columbus NE 68601
Street City State ZIP
5. Facility Name: Sheldon Station

Address: 4500 West Pella Road Hallam NE 68368
Street City State ZIP

Where can I find more information about the requirements of 40 CFR Part 63 Subpart ZZZZ?

You can find more information about Subpart ZZZZ, including federal register notices, brochures, and implementation tools, by going to the Nebraska Dept. of Environmental Quality (NDEQ) website at www.deq.state.ne.us and selecting "Focus on Air". From there, select the "Air Toxics Program", then under "Air Toxics Notebook", select the link for Subpart ZZZZ. You can also find it at this direct link: <http://www.deq.state.ne.us/AirToxic.nsf/pages/ZZZZ>. You can also contact Gary Walsh of the Lincoln-Lancaster County Health Department Air Quality Section at (402) 441-8039, or the NDEQ Air Toxics Coordinator at (402) 471-2189.

This Initial Notification must be completed, signed, and submitted to the Lincoln-Lancaster County Health Department along with a cover letter signed by a responsible official certifying that the information contained herein is true, accurate, and complete. This Initial Notification is due in accordance with the following dates:

- **December 13, 2004** for stationary RICE with a site rating of greater than ($>$) 500 hp located at a 'major source' of HAP that were started-up before August 16, 2004.
- **Within 120 days of start-up** for stationary RICE with a site rating of greater than ($>$) 500 hp located at a 'major source' of HAP that were/are started-up after August 16, 2004.
- **July 16, 2008** for stationary RICE with a site rating of less than or equal to (\leq) 500 hp located at a 'major source' of HAP that were started-up before March 18, 2008.
- **Within 120 days of start-up** for stationary RICE with a site rating of less than or equal to (\leq) 500 hp located at a 'major source' of HAP that were/are started-up after March 18, 2008.
- **August 31, 2010 or within 120 days of start-up** (whichever is later) for existing stationary RICE located at a 'major source' or an 'area source' of HAP.

Copies of this notification shall be sent to:

Lincoln-Lancaster County Health Department
Attn: Gary Walsh
3140 N Street
Lincoln, NE 68510

and

EPA Region VII
Attn: Chief, APCO
901 N. 5th Street
Kansas City, KS 66101-2907

If you have any questions, or require assistance in completing this form, please call the LLHCD Air Pollution Control Program at (402) 441-8040.

SECTION 2 – Applicability Information

What is an 'area source' of Hazardous Air Pollutant (HAP) emissions, and what is a 'major source' of HAP emissions?

- An 'area source' of HAP emissions is a source that emits, or has the maximum potential to emit, any single HAP at a rate of less than 10 tons per year, and/or any combination of HAP at a rate of less than 25 tons per year.
- A 'major source' of HAP emissions is a source that emits, or has the maximum potential to emit, any single HAP at a rate of greater than or equal to 10 tons per year, and/or any combination of HAP at a rate of greater than or equal to 25 tons per year.

How do I know if I am an existing source, or a new/reconstructed source?

- You are an *existing source* under 40 CFR Part 63 Subpart ZZZZ if your RICE meets any of the following:
 - Stationary RICE with a site rating of >500 hp located at a 'major source' of HAP emissions that was installed or built on-site prior to December 19, 2002
 - Stationary RICE with a site rating of ≤ 500 hp located at a 'major source' of HAP emissions that was installed or built on-site prior to June 12, 2006
 - Stationary RICE located at an 'area source' of HAP emissions that was installed or built on-site prior to June 12, 2006
- You are a *new/reconstructed source* if your RICE was installed, built on-site, or reconstructed on or after the above dates as applicable. A change in ownership does not affect the status as an *existing source*.

Who needs to complete and submit this form?

- Owners/operators of any of the following need to complete and submit this form:
 - Existing non-emergency stationary compression ignition (CI) RICE with a site rating of >100 hp and ≤ 500 hp located at a 'major source' of HAP emissions
 - Existing non-emergency CI RICE with a site rating of >300 hp located at an 'area source' of HAP emissions
 - All existing, new, or reconstructed non-emergency stationary RICE with a site rating of >500 hp located at a 'major source' of HAP emissions
 - New or reconstructed stationary emergency and limited use RICE with a site rating of >500 hp located at a 'major source' of HAP emissions
 - New or reconstructed stationary non-emergency spark-ignition (SI) four-stroke lean burn (4SLB) RICE with a site rating of ≥ 250 hp located at a 'major source' of HAP emissions

Who does not need to complete and submit this form?

- Owners/operators of any of the following are not required to complete and submit this form:
 - Existing stationary CI RICE with a site rating of <100 hp
 - Existing stationary emergency CI RICE located at residential, commercial, institutional, and/or industrial facilities at both 'area sources' and 'major sources' of HAP emissions.

Who does not need to complete and submit this form? (continued from previous page)

- Existing stationary CI RICE that are not subject to any numerical emission standards
- New or reconstructed stationary RICE that are subject to the New Source Performance Standards set forth in 40 CFR Part 60, *except* for the new or reconstructed stationary RICE listed in the previous section)
- Sources not subject to the requirements set forth in 40 CFR Part 63 Subpart ZZZZ (see list below)

Who is not subject to the requirements of 40 CFR Part 63 Subpart ZZZZ?

- The following **existing** sources are not currently subject to the requirements set forth in 40 CFR Part 63 Subpart A or Subpart ZZZZ:
 - Stationary SI four-stroke rich burn (4SRB) RICE located at an 'area source' of HAP emissions
 - Stationary SI 4SRB RICE with a site rating of ≤500 hp located at a 'major source' of HAP emissions
 - Stationary SI two-stroke lean burn (2SLB) RICE
 - Stationary emergency or limited use RICE with a site rating of >500 hp located at a 'major source' of HAP emissions
 - Stationary SI emergency or limited use RICE
 - Stationary RICE combusting landfill gas or digester gas equivalent to 10% or more of the gross heat input on an annual basis
 - Stationary emergency residential, commercial, or institutional CI RICE located at an 'area source' of HAP emissions (Emergency CI RICE at *industrial* area sources must still comply with this rule. See §63.6603.)
- The following **new or reconstructed** RICE sources must meet compliance with Subpart ZZZZ by complying with 40 CFR Part 60, Subparts IIII (for Compression Ignition RICE) and JJJJ (for Spark Ignition RICE):
 - Stationary RICE located at an area source of HAP emissions
 - Stationary RICE located at a major source of HAP emissions that also meet the following:
 - SI 2SLB RICE with a site rating of <500 hp
 - SI 4SLB RICE with a site rating of <250 hp
 - SI 4SRB RICE with a site rating of ≤500 hp
 - RICE with a site rating of ≤500 hp which combusts landfill gas or digester gas equivalent to 10% or more of the gross heat input on an annual basis
 - Emergency or limited use RICE with a site rating of ≤500 hp
 - CI RICE with a site rating of ≤500 hp
- New or reconstructed stationary emergency and limited use RICE with a site rating of >500 hp located at a 'major source' of HAP emissions (these RICE must still comply with the NSPS Subparts IIII or JJJJ where applicable)

When do I have to comply with the applicable requirements of 40 CFR Part 63 Subpart ZZZZ?

- **June 15, 2007** for existing stationary SI 4SRB RICE with a site rating of >500 hp located at a 'major source' of HAP emissions
- For new or reconstructed stationary RICE with a site rating of >500 hp located at a 'major source' of HAP emissions, compliance deadlines are as follows:
 - **August 16, 2004** for RICE started-up before August 16, 2004
 - **Upon date of start-up** for RICE started-up after August 16, 2004
- For new or reconstructed stationary RICE with a site rating of ≤500 hp located at a 'major source' of HAP emissions, compliance deadlines are as follows:
 - **January 18, 2008** for RICE started-up before January 18, 2008
 - **Upon date of start-up** for RICE started up after January 18, 2008
- For new or reconstructed stationary RICE located at an 'area source' of HAP emissions, compliance deadlines are as follows:
 - **January 18, 2008** for RICE started-up before January 18, 2008
 - **Upon date of start-up** for RICE started up after January 18, 2008
- **May 3, 2013** for the following sources:
 - Existing stationary non-emergency CI RICE with a site rating of >500 hp located at a 'major source' of HAP emissions
 - Existing stationary RICE with a site rating of ≤500 hp located at a 'major source' of HAP emissions
 - Existing stationary CI RICE located at an 'area source' of HAP emissions
- For 'area sources' of HAP emissions that become 'major sources' of HAP emissions, compliance deadlines are as follows:
 - **Upon start-up** for RICE installed or built on-site after the date the 'area source' becomes a 'major source'
 - **Within 3 years of becoming a 'major source'** for RICE installed or built on-site before the date the 'area source' becomes a 'major source'

SECTION 3 – Applicability Determination

Check the statement below that applies to your source:

- ☐ This source is an 'area source' for HAP emissions
☒ This source is a 'major source' for HAP emissions

Please provide the following information for all stationary RICE at your source. Duplicate this page as needed.

Unit #	New or Existing	Start-Up Date	hp Rating	Displacement (liters/cyl)	Fuel(s) Burned ¹ (NG/O/G/PR)	Compression Ignition?	Spark Ignition (type)	Emergency?	Limited Use?
1	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing	/ /1960	600	7.9	O	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 4SRB <input type="checkbox"/> 4SLB <input type="checkbox"/> 2SLB	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
2	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing	/ /1962	170	1.3	O	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 4SRB <input type="checkbox"/> 4SLB <input type="checkbox"/> 2SLB	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
3	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing	/ /1962	170	1.3	O	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 4SRB <input type="checkbox"/> 4SLB <input type="checkbox"/> 2SLB	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> New <input type="checkbox"/> Existing	/ /				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 4SRB <input type="checkbox"/> 4SLB <input type="checkbox"/> 2SLB	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
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	<input type="checkbox"/> New <input type="checkbox"/> Existing	/ /				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> 4SRB <input type="checkbox"/> 4SLB <input type="checkbox"/> 2SLB	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

¹ NG = Natural Gas O = Fuel Oil G = Gasoline PR = Propane

SECTION 4 – Performance Test Methods & Results

ONLY COMPLETE THIS SECTION IF YOU WISH TO CERTIFY COMPLIANCE WITH SUBPART ZZZZ.

Describe the methods and results of the performance tests for each RICE unit listed in Section 3.

Unit(s) #	Test Method	Test Results

Describe the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods.

Describe the type and quantity of HAP emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the rule.

Provide a description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each HAP and the control efficiency (percent) for each control device (or method).

SECTION 5 – Compliance Dates and Compliance Status

The compliance deadlines for Subpart ZZZZ are listed at the end of Section 2. Indicate your compliance status below:

Compliance Status (check one)	
Note: The relevant requirements that you must evaluate in making this determination are specified in 40 CFR Part 63, §63.6600 through §66.6665. Only evaluate those requirements as applicable to your affected sources.	
<input type="checkbox"/>	a. I am already in compliance with each of the relevant requirements
<input checked="" type="checkbox"/>	b. I will be in compliance with each of the relevant requirements by the required compliance date

SECTION 6 – Certification of Accuracy and Truthfulness

I certify that all information in this report is accurate and true to the best of my knowledge.


(Signature of Responsible Official)

8/31/10
(Date)

* - A "Responsible Official" can be:

- The president, vice president, secretary, or treasurer of the company that owns the facility;
- The owner of the facility;
- The supervisor or manager of the facility;